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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ALMA AGUILAR,	)	Case No.: 1:22-cv-01014-BAM
	)	
	)	STIPULATION FOR VOLUNTARY
	)	REMAND PURSUANT TO SENTENCE
	)	FOUR OF 42 U.S.C. § 405(g)
Plaintiff,	)	
	)	
v.	)	
KILOLO KIJAKAZI,	)	
Acting Commissioner of Social Security	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties, through their undersigned attorneys, and with the approval of the Court, that the Commissioner of Social Security has agreed to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The purpose of the remand is to offer Plaintiff a new decision.

On remand, the Commissioner will offer Plaintiff the opportunity for a new hearing; develop the record as necessary; consider all pertinent issues *de novo*, including, but not limited to, (1) reevaluating the medical opinion and prior administrative medical finding evidence, (2) reconsidering the subjective symptoms allegations, (3) reconsidering the residual functional

capacity finding, and (4) reconsidering the claimant's right to representation; and issue a new decision. The parties further request that the Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

Respectfully submitted,

DATE: March 31, 2023

*/s/ Robert Terence LaPorte \**  
ROBERT TERENCE LAPORTE  
Attorney for Plaintiff  
(\* approved via email on 3/30/23)

PHILLIP A. TALBERT  
United States Attorney

DATE: March 31, 2023

By *s/ Marcelo Illarmo*  
MARCELO ILLARMO  
Special Assistant United States Attorney

Attorneys for Defendant

**ORDER**

Based upon the parties' Stipulation for Voluntary Remand Pursuant to Sentence Four of 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the above-captioned action is remanded to the Commissioner of Social Security for further proceedings consistent with the terms of the Stipulation to Remand. The Clerk of the Court shall enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner. IT IS SO ORDERED.

Dated: April 3, 2023

*/s/ Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE